



EG&G ROCKY FLATS, INC.
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June 25, 1992

92-RF-7271

Terry A. Vaeth
Manager
DOE, RFO

Attn: J. K. Hartman

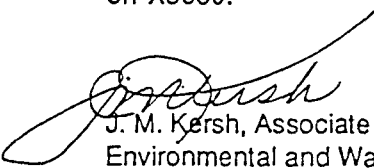
RECOMMENDATION FOR IMPLEMENTATION OF INDUSTRIAL AREA OPERABLE UNIT
ECOTOXICOLOGICAL INVESTIGATIONS (6627) - JMK-0619-92

With reference to your memorandum dated June 15, 1992, we will modify the environmental evaluation work plan for industrial area operable units (OUs) (essentially the technical memorandum addendum to the OU 9 RFI/RI work plan) so that the work falls into two "stages": Stage 1 will encompass habitat and biota surveys and Stage 2 will encompass ecotoxicological investigations. These stages need not be directly correlated with the RFI/RI phases, in that, Stages 1 and 2 may be conducted during the RFI/RI Phase I or Stage 2 may be deferred to the RFI/RI Phase II. The limiting factor in the implementation of any Stage 2 work will be the availability of reasonable data on the nature and extent of contaminants of concern (COCs).

We recommend the following strategy for implementation of the environmental evaluation work plan for industrial area OUs:

- Conduct a single Stage 1 habitat and biota survey for the entire industrial area at one time. A single technical memorandum, encompassing the reports detailed in your memorandum, would emerge from this Stage 1 work and would be available for inclusion in Draft Phase I RFI/RI reports for OUs 8, 9, 10, 12, 13, and 14. A portion of this work could be undertaken as early as August 1992.
- Initiate Stage 2 ecotoxicological investigations as soon as a reasonably complete list of COCs (target analytes) can be developed. Given that we will focus on COCs with known bioaccumulation or bioconcentration potential, such a list need not be exhaustive and may be developed with currently available information. We are concerned that delay of Stage 2 work will deprive environmental evaluations taking place in buffer zone areas, adjacent to the industrial area, of valuable information on biotic storage and transport of COCs. This work could begin as early as April 1993.

If there are any questions or concerns, please contact Steve Nesta on X8605, or Richard Flory on X8680.

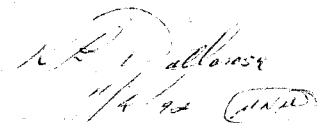

J. M. Kersh, Associate General Manager
Environmental and Waste Management

BKH:bmb

Orig. and 1 cc - T. A. Vaeth

cc:
B. K. Thatcher, Jr. - DOE, RFO

ADMIN RECORD


11/4/92